

To whom it may concern

Subject **For a sustainable construction sector: All Environmental Indicators in the Construction Products Regulation (CPR) need to be declared mandatory**

With the triologue negotiations on the CPR drawing to a close, ECO Platform would like to reiterate their support for an environmentally ambitious CPR, which in our view is closely linked to the requirement to disclose environmental product information via sustainability indicators, anchored in the legislation. Specifically, we consider that:

- The CPR should not fall behind the sustainability ambition of other products requirements (Eco-design requirements for Sustainable Products Regulation (ESPR)), and it should aim to establish the EU as a leader on sustainable construction;
- Sustainability requirements and assessment of construction products in the CPR should go beyond global warming potential only;
- All environmental characteristics are already today made available voluntarily via Environmental Product Declarations (EPD). Leaving aside, or delaying, crucial indicators such as e.g. “water consumption” or “depletion of resources” cannot provide a holistic sustainability assessment;
- LCA tools make all the data available, so no additional costs or burdens are created if all characteristics have to be reported.

Background

The main objectives of the CPR revision are to ensure transparency in the internal market for construction products and to better anchor sustainability criteria in the body of the regulation to enable all the Green Deal targets.

Construction products manufacturers have a well-established and robust approach to communicating environmental performance via Environmental Product Declarations (EPD) based on the European standard EN15804-A2 which already includes the disclosure of the full set of indicators.

Annex I point 2 of the draft new CPR enshrines the EPD sustainability indicators in the text of the CPR. In its adopted position the European Parliament, supported by the European construction products industry (Construction Products Europe) as well as environmental NGOs (ECOS), has favoured making the declaration of all the listed indicators mandatory. The council, on the other hand, had advocated to only make “global warming potential (GWP)” a mandatory indicator.

We appreciate the parliaments’ stance on a more environmentally ambitious CPR and as negotiations between the institutions are drawing to a close, we would like to underline again that making only certain indicators mandatory or delaying / phasing-in the mandatory application

of specific indicators to a later date is of no added value for manufacturers or customers. In order to provide the value of the mandatory indicator, GWP, all the other indicators need to be calculated anyhow and at no additional cost. On the contrary, providing only one indicator, even for a few years, will certainly lead to confusion in the market and could result in less environmental information being made available in the time until all indicators have become mandatory.

We therefore urge the European institutions to follow the European Parliaments recommendation on Annex 1 point 2 and require all indicators listed there to be declared mandatory and without delays.

With kind regards,

A handwritten signature in black ink, appearing to read "Håkon Hauan".

Håkon Hauan
President ECO Platform

A handwritten signature in black ink, appearing to read "Christian Donath".

Christian Donath
Managing Director ECO Platform